January 17, 2013 R. Sills **EPA Region 5 States Benchmarking Comparison Table**
HRA = Health risk assessment; i.e., modeling of ambient air impacts and comparison to health-protective benchmark values
N/M = New or modified sources. E = Existing sources.

Air Toxics Program Characteristic		MI	MN	OH	WI	IN	IL
Impetus for HRA of air emission sources	Required by statute or rules	yes	yes (statute requires cumulative RA for certain sources and locations)	yes	yes		
	By policy		yes (except as noted above)			yes	yes
	If significant interest by public or applicant (i.e., not routine)		yes (for existing sources)			yes	Not routine, done only if significant public concerns.
	Discretionary by agency					No criteria for max. ambient air impacts, but permit may be denied if "adverse."	
HRA done for **new/modified (N/M) or existing (E)** sources		N/M	N/M, and also E if significant public interest	N/M. Also existing sources are evaluated on a case-by-case basis	N/M or E	N/M	N/M

Source types or emission rate **exemptions** from HRA?		Yes	Yes	Yes (i.e., exempt if each TAP emission is ≤1 ton/yr)	Yes (i.e., HAPs exempt if covered by a MACT, but only if chem-specific emission thresholds not exceeded)		
What air toxics are subject to HRA?	Any					yes	
	All except 41 exemptions	yes					
	Unique list beyond HAPs (how many CPDs/Groups)		yes (any with a benchmark value from IRIS, Cal or MDH)	yes (n= 303 TAPs; includes all HAPs plus others)	yes (n= 535; 26 HAPs not included)		
	HAPs only						
How are **cumulative** air toxics impacts accounted for?	Generally not accounted for in permit review.	yes		yes	yes	yes	
	Can be considered in permit review	yes (Rule 228)	Done under statutory requirements for Minneapolis.	yes (combined impacts; not background conc.)			
	Routinely accounted for in permit review.						

How are **cumulative** air toxics impacts accounted for? (continued)	? Routinely evaluated via statewide monitoring or modeling initiative, ± risk reduction targets?	Detroit ambient air evaluated in 2005 and 2010 Detroit Air Toxics Initiative reports; no risk ↓ target; several facility-specific monitors are in operation.		Specific monitoring or modeling studies have been conducted to evaluate specific concern sources/areas. No risk ↓ target.	RAIMI statewide HAPs modeling of cumulative impacts of all sources; goal of 50% reduction (from 2002 to 2012) of people at >1E-6 CA risk.	Focused studies of monitoring and risk assessment completed for Indianapolis, and underway for the lakeshore area; statewide RAIMI modeling; are evaluating high-risk NATA'05 facilities. No risk ↓ target.	
Acceptable risk **benchmarks**		1E-6 per cpd for the process. 1E-5 per cpd for the facility. 10X higher for roads and indus. areas. EPA or other agency values; TLV/100; or derived from short-term studies. Default ITSL= 0.1 ug/m3.	Provided to MPCA by MDH, based on values from EPA or other agencies, or derived by MDH.	IRIS values; modeled 1 hr AT max impacts not to exceed TLV/42.	1E-6 per cpd. 1E-5 all cpds. EPA RfCs etc. TLV-TWA/42 with 24-hr AT. TLV-Ceiling/10 with 1-hr. AT.	Use various EPA approved sources and databases.	